

May 27, 1998

VPCD-98-08 (LDV/LDT/SM/ICI)

Dear Manufacturer:

SUBJECT: Reminder to Include in the Application for
Certification a Description of AECDs Which May Reduce
the Effectiveness of the Emission Control System

The purpose of this letter is to remind manufacturers to include certain types of calibration information and statements of compliance in their application for certification.

Additionally, to make more efficient use of our resources, we request that manufacturers submit certificate requests approximately 30 to 60 days prior to the time when the certificate is needed. The certificate request should include all the necessary information needed for EPA to issue a certificate of conformity, including the complete application for certification; a copy of the fee filing form, OBD approval letters; test results; an error-free EPA summary sheet; and other supporting information as needed.

Information Currently Required by §86.094-21(b)(1)(i)

The provisions of 40 CFR 86.094-21(b)(1)(i) require that each application for certification include 1) a detailed description of each Auxiliary Emission Control Device¹ (AECD), 2) a detailed justification of each AECD which results in a reduction in the effectiveness of the emission control system; and 3) a statement of compliance that the engine family is designed within the intermediate temperature cold testing defeat device guidance provided in §86.094-16. The detailed description of the AECD should include parameters sensed and controlled, and the expected effect the AECD has on emissions (both on- and off-cycle). All AECDs that reduce the effectiveness of the emission control system and therefore require a justification include "lean-on-cruise" and "air-conditioner-on" strategies. This information should be supplied in a form that can be easily understood by an engineer skilled in automotive emissions control, e.g. not in computer language.

¹§86.082-2 defines an AECD to mean "any element of design which senses temperature, vehicle speed, engine RPM, transmission gear, manifold vacuum, or any other parameter for the purpose of activating, modulating, delaying, or deactivating the operation of any part of the emission control system." Vehicle computer control strategies are thus considered to be AECDs.

Additionally, we request that large volume manufacturers include a defeat device statement in their application for certification, if possible, similar to the statement required of small volume manufacturers in 40 CFR 86.094-14(c)(11)(ii)(D)(3)); although such a statement is not actually required by regulation.

SFTP Information Required by §86.1708-99 and §86.1709-99

The provisions of §86.1708-99(e)(3)&(4) and §86.1709-99(e)(3)&(4) specifically require manufacturers to submit information related to any "air conditioner-on" and "lean-on-cruise" calibrations. These requirements will apply beginning in model year 2001, to manufacturers who have opted in to the National Low Emissions Vehicle (NLEV) program, for engine families certified to the NLEV Supplemental Federal Test Procedure (SFTP) emission standards.

EPA would like to meet with individual manufacturers to review the appropriateness of their SFTP emission control strategy prior to certification. Please contact your certification representative to schedule a meeting. We request that manufacturers supply an advance copy of the material that will be presented, approximately one or two weeks prior to the meeting, so that we can prepare for the meeting.

If you have any questions about this letter, please contact your certification team representative.

Sincerely,

Jane Armstrong, Director
Vehicle Programs and Compliance Division
Office of Mobile Sources

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